

Joseph & Norinsberg LLC

Fighting for Employee Justice



Queens Office

69-06 Grand Avenue, 3rd Floor
Maspeth, New York 11378

Manhattan Office

110 East 59th Street, Suite 2300
New York, New York 10022

Newark Office

One Gateway Center, Suite 2600
Newark, New Jersey 07102

Philadelphia Office

1515 Market Street, Suite 1200
Philadelphia, Pennsylvania 19102

Boston Office

225 Franklin Street, 26th Floor
Boston, Massachusetts 02110

Orlando Office

300 N. New York Ave, Suite 832
Winter Park, Florida 32790

Jon L. Norinsberg, Esq.
jon@norinsberglaw.com

November 22, 2024

VIA ECF

Hon. Jennifer H. Rearden
United States District Judge
United States Courthouse
500 Pearl Street, Room 12B
New York, NY 10007
(212) 805-0320

Re: Robles v. Green Flamingo Dispensary, LLC
Case No. 24-cv-7479 (JHR)

Dear Judge Rearden:

Our office represents Plaintiff, Primitivo Robles (“Plaintiff”) in the above-referenced Americans with Disabilities Act (“ADA”) matter against Defendant, Green Flamingo Dispensary, LLC (“Defendant”) which was filed on October 24, 2024, and served upon the Defendant on October 23, 2024 (Docket No. 6). The Defendant's deadline to respond was on November 18, 2024, and though that time period has passed without receiving the Answer, we have been attempting to contact defendant directly through alternate means of service in order to prevent the filing of a Default Judgment.

This afternoon we received a call from a person purporting to be the owner of Green Flamingo Dispensary, LLC, requesting a short period of time in which to retain counsel in order to “take care of the case,” to which we agreed. This is the first request for an extension, and we have no objection to extending this matter for a 2-week period until December 6, 2024; at which time should defendant fail to make an official appearance, Plaintiff will seek relief via request for a Default Judgment.

We trust that the Court will find this letter sufficient to extend Defendant’s the time to Answer the Complaint until December 6, 2024. We remain committed to resolving this case promptly and will notify the Court upon reaching a resolution.

Thank you for your attention to this matter.

Respectfully submitted,

JOSEPH & NORINSBERG, LLC

Sincerely,

A handwritten signature in blue ink, appearing to be "Jon L. Norinsberg", with a long horizontal flourish extending to the right.

Jon L. Norinsberg, Esq.
Bennitta L. Joseph, Esq.
Attorneys For Plaintiff
110 East 59th Street,
Suite 2300
N.Y., N.Y. 10022
(212) 227-5700
Fax No. (212) 656-1889
jon@norinsberglaw.com
bennitta@employeejustice.com